

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10188-MLW
)	
RICHARD SHIPLEY)	

JOINT STATUS REPORT

The parties hereby respectfully submit their Joint Status Report addressing the issues set forth at Local Rule 116.5(a)(1)-(7) as follows:

(1) The parties do not believe relief need be granted from the timing requirements set forth at L.R. 116.3.

(2) The government does not anticipate offering the testimony of an expert witness. In the event this position changes, the defendant does request discovery concerning expert witnesses under Fed. R. Crim. P. 16(a)(1)(G). The parties propose that such discovery be provided no later than 30 days before trial and that the defendant make reciprocal disclosure no later than 15 days before trial.

(3) The government has provided all appropriate disclosures at this time. The government does not expect to make additional disclosures except, if appropriate, in response to a letter request by the defendant.

(4) The parties request that a motion date be established under Fed. R. Crim. P. 12(c).

(5) The following period of excludable delay should be

ordered under the Speedy Trial Act: the time period from September 13, 2005 through and including October 11, 2005, which is the 28 day period after arraignment wherein the parties were developing their discovery plans and producing discovery under the automatic discovery process. Local Rule 112.2(A)(2).

(6) It appears at this juncture that a trial will be necessary. The government estimates that its case will take four trial days.

(7) The parties request that an Interim Status Conference be set during the week of December 5, 2005 and a Final Status Conference be set during the week of January 31, 2005.

RICHARD SHIPLEY

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